



Chevron U.S.A. Inc.

2410 Camino Ramon, San Ramon, California • Phone (415) 842-9500

Mail Address: P.O. Box 5004, San Ramon, CA 94583-0804

Marketing Operations

February 9, 1990

D. Moller
Manager, Operations
S. L. Patterson
Area Manager, Operations
C. G. Trimbach
Manager, Engineering

Mr. Gil Wistar
Alameda County
Environmental Health
80 Swan Way, Suite 200
Oakland, California 94621

Re: January 22, 1990
Notice of Violation
Five Chevron Stations

Dear Mr. Wistar:

This letter is in response to your Notice of Violation dated January 22, 1990 for five Chevron service station sites in Alameda County. We will reply to those violations individually by service station.

1. 3701 Broadway, Oakland Chevron SS#9-1026

The remediation alternatives plan was mailed to your former 27th Street address August 23, 1989. Enclosed we are forwarding a copy of that plan.

Chevron is currently negotiating with the property owner an acceptable location for the treatment system. We anticipate resolving this issue shortly and the May 17, 1990 deadline will be adhered to. This date is contingent upon receiving necessary operating permits however.

Chevron will meet the March 1, 1990 progress report deadline.

2. 7420 Dublin Blvd., Dublin Chevron SS#9-2582

On November 3, 1989, a report documenting groundwater sampling conducted August 2, 1989, was forwarded to your office. As indicated in this report, only the tank backfill well showed levels of hydrocarbon contaminants. The other three groundwater monitoring wells showed non-detect.

The fourth quarter sampling has been completed and the report of findings is enclosed. As indicated in this report, the three

groundwater monitoring wells remained non-detect for hydrocarbon contaminants.

Permitting the new tank installation took much longer than anticipated and kept the independent Dealer out of operation for a long period of time. In order to minimize the Dealers hardship and the fact that groundwater sampling suggested that the contamination is localized around the tank complex and is not migrating offsite, Chevron felt that the Dealers operation should not be immediately hindered after his reopening. Western Geologic is in the process of conducting a vapor extraction vent test which will provide information necessary to finalize the treatment system design. Soil venting by April 6, 1990 is workable and an operational groundwater treatment system is possible by April 27. Chevron will make every attempt to meet these deadlines.

3. 5500 Telegraph Ave., Oakland Chevron SS#9-0338

In July 1989 modifications to underground piping were performed at this site. Soil samples collected after overexcavation of the piping trenches continued to show hydrocarbon contaminants. Chevron concurred with your request to install groundwater monitoring wells to define the full extent of contamination. Your office formally requested submittal of a work plan and an unauthorized release report on September 13, 1989. Your notice of violation states that you have not received this information. Enclosed we are forwarding copies of the work plan dated October 6, 1989 and release report dated September 19, 1989. According to our records the work plan was mailed to your office October 10, 1989 and the release report September 19, 1989. Verbal approval of the work plan was received from your office on November 1, 1989. The wells have been installed and our consultants report of findings will be submitted prior to your requested March 9, 1990 due date.

4. 5509 Martin Luther King, Jr. Way, Oakland Chevron SS#9-1583

Again during piping modifications performed at this site in December of 1989, levels of hydrocarbon contaminated soil were encountered. At that time your office verbally requested installation of groundwater monitoring wells to define the extent of contamination. Chevron concurred with your request and a consultant has been retained to perform this work. Your April 6, 1990 due date for a report of findings will be adhered to. In your Notice of Violation letter you have requested that a release report be filed. This report has been prepared and forwarded to your office under a separate cover letter. Enclosed is a copy of that report dated January 25, 1990.

~~5. 1925 Barcelona St., Livermore Chevron SS#9-7314~~

In early 1989 Chevron retained EA Engineering to perform an environmental assessment at this site to prepare for a scheduled permanent closure of the underground tank and piping facilities. This assessment consisted of performing a soil vapor survey and advancing five soil borings to depths up to 50 feet. One soil sample collected at a depth of 10.5 feet from a boring adjacent to the underground storage tank showed 740 PPM total petroleum hydrocarbon as gasoline (TPHG). Samples collected below 10.5 from all the borings showed no detectable TPHG or Benzene. Based on these findings, EA did not recommend further work. The report of these findings was submitted to your office September 6, 1989. Beginning on September 18, 1989 Chevron proceeded with the planned tank removal. EA was retained to collect excavation closure soil samples. All soil samples collected below the fuel storage tanks and pipelines showed at most 33 PPM-TPHG and 0.065 PPM Benzene. An additional soil sample was collected from a trench dug beyond the south wall of the tank field beyond the borehole that contained the soil sample which showed 740 PPM-TPHG. This soil sample showed no detectable TPHG. Soil samples collected of the fuel tank backfill and used oil tank excavation showed levels of contamination which required removal and disposal of those soils. Due to sampling turnaround requirements and lengthy soil disposal arrangements, overexcavation of the used oil tank excavation and soil disposal continued thru mid-December. Final sampling of the used oil tank excavation showed no detectable levels of oil and grease contamination. The final report of this work will be submitted to your office by February 15, 1990. Your Notice of Violation requests the submittal of a release report and a work plan to address soil and potential groundwater contamination. The release report has been prepared and was submitted to your office under a separate cover letter. A copy is enclosed. In regards to the work plan, the assessment work completed to date indicate that only very minor soil contamination exists below this site. Contaminated soil discovered during the tank removal was removed to practical limits. Our consultant, EA, concluded that the low levels of detected hydrocarbon remaining do not represent a risk based on LUFT analysis. As such, upon your review of the final report which will be submitted as noted, we will await your comment and concurrence.

You have noted that Chevron was in violation for failure to submit unauthorized release reports at three of the five discussed stations. We would like to receive formal clarification to your requirement for these reports. It is clear to Chevron that release reports are required whenever a known release occurs such as in the case of a precision test failure or breach of underground fueling system integrity. This immediate reporting requirement makes sense from the standpoint that immediate

attention may be required to effect public protection. However, in situations involving tank or piping closures and discretionary environmental assessments for property transfers, where hydrocarbons found in the soil may have been released many years prior to being found and ongoing assessment reports are or will be submitted to the regulatory authorities, it seems that filing an unauthorized release report is redundant and a duplication of effort. It is important for Chevron to receive clarification to your requirements along with governing regulatory guidelines as we suspect that many stations for which we have been in the process of investigating and remediating in the recent past, may not have had formal release reports filed. It has been our assumption that submittal of formal assessment reports generated during tank closures and property transfers satisfied your reporting requirements and an additional report was not required.

We hope that the above comments have addressed your concerns. If you have any further questions please do not hesitate to call John Randall at 842-9625.

Sincerely,


C. G. Trimbach

JMR/jmr
Enclosures

cc: Lester Feldman w/o enclosures
RWQCB
1800 Harrison Street
Suite #700
Oakland, CA 94612

Gil Jensen w/o enclosures
District Attorney
Alameda County Consumer and Environmental Protection Division
24405 Amador St.
Hayward, CA 94544

Rafat Shahid w/o enclosures
Asst. Agency Director, Environmental Health
Alameda County Health
80 Swan Way, Suite 200
Oakland, CA 94621

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